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Via Hand Delivery

July 1, 2014

Ms. Marlene Dortch Federal Communications Commission 445 12th Street SW Washington, D.C. 20554

Re:

FCC Form 481 - High-Cost Support Information and Low-Income Support Information

Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a)

Dear Secretary Dortch:

Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a) of the Federal Communication Commission's regulations, please find enclosed the FCC Form 481 for Ketchikan Public Utilities. This form was also filed at the Regulatory Commission of Alaska (RCA) and USAC.

Ketchikan Public Utilities seeks confidential treatment for its financial information pursuant to the Protective Order, Connect America Fund, et al., WC Docket No. 10-90 et al., (Nov. 16, 2012). A redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under 47 C.F.R. §§ 0.457 and 0.459 of the initial § 54.202(a) Five-Year Service Quality Improvement Plan.

Please do not hesitate to contact me if you have any questions or I may be of any assistance.

Sincerely,

DYKEMA GOSSETT PLLC

Shannon M. Heim

4000 Wells Fargo Center 90 South Seventh Street Minneapolis, MN 55402

Phone (612) 486-1586

Fax: (855) 223-7059

Email: sheim@dykema.com

SMHE/ebl Enclosure

June 30, 2014

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 10-90, 47 CFR § 54.313 Annual Reporting Requirements for High-Cost Recipients (Form 481)

Dear Ms. Dortch:

Attached please find City of Ketchikan d/b/a Ketchikan Public Utilities – Telecommunication Division's high-cost support recipient annual report pursuant to 47 CFR § 54.313 (Form 481).

City of Ketchikan d/b/a Ketchikan Public Utilities – Telecommunication Division is filing certain financial information, reported pursuant to 47 CFR §54.313(f)(2), as confidential under the November 16, 2012 Protective Order (DA 12-1857). Pursuant to that Order, each page of this filing has been marked "REDACTED - FOR PUBLIC INSPECTION." The non-redacted version of this information has been marked "CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, GN DOCKET NO. 09-51, CC DOCKET NOS. 01-92, 96-45, WT DOCKET NO. 10-208 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION." As such, City of Ketchikan d/b/a Ketchikan Public Utilities – Telecommunication Division requests that the non-redacted version of its submission be withheld from public inspection.

City of Ketchikan d/b/a Ketchikan Public Utilities – Telecommunication Division is also requesting confidential treatment of certain information being filed pursuant to 47 CFR § 54.202(a)(1)(ii)and 54.313(a)(1) (five year service quality improvement plan) under 47 CFR § 0.457 and 0.459. The redacted version of this filing has been marked "REDACTED - FOR PUBLIC INSPECTION." The non-redacted version has been marked "CONFIDENTIAL - NOT FOR PUBLIC INSPECTION."

Pursuant to 47 CFR § 0.459, City of Ketchikan d/b/a Ketchikan Public Utilities – Telecommunication Division offers the following in support of its request for confidential treatment of certain information.

- Identification of the specific information for which confidential treatment is sought: City of Ketchikan d/b/a Ketchikan Public Utilities – Telecommunication Division seeks confidential treatment of the five year service quality improvement plan required per 47 CFR § 54.202(a)(1)(ii) and 54.313(a)(1),
- Identification of the Commission proceeding in which the information was submitted or a
 description of the circumstances giving rise to the submission: City of Ketchikan d/b/a Ketchikan
 Public Utilities Telecommunication Division is providing the five year service quality
 improvement plan as part of its annual high-cost support recipient report per 47 CFR § 54.313.

- Explanation of the degree to which the information is commercial or financial, or contains a
 trade secret or is privileged: City of Ketchikan d/b/a Ketchikan Public Utilities –
 Telecommunication Division considers the information to be highly sensitive in that it contains
 statements about the Company's future investment plans, and discusses specific equipment and
 strategies the Company will utilize to provide services.
- Explanation of the degree to which the information concerns a service that is subject to
 competition: City of Ketchikan d/b/a Ketchikan Public Utilities Telecommunication Division
 provides voice and broadband services that are in competition with various landline and wireless
 providers; thus, the investment data disclosed is related to services subject to competition to a
 high degree.
- Identification of any measures taken by the submitting party to prevent unauthorized disclosure:
 City of Ketchikan d/b/a Ketchikan Public Utilities Telecommunication Division makes the data being provided available only to employees, consultants, and attorneys on a limited, need-to-know basis.
- Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties: The information is not publicly available.
- Justification of the period during which the submitting party asserts that material should not be available for public disclosure: City of Ketchikan d/b/a Ketchikan Public Utilities –
 Telecommunication Division requests that the data provided be treated as confidential indefinitely. Due to the sensitive nature of the data, it would not be appropriate for public disclosure at any time in the foreseeable future.
- Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidential treatment should be granted: None.

Accordingly, City of Ketchikan d/b/a Ketchikan Public Utilities – Telecommunication Division requests confidential treatment of the five year service quality improvement plan pursuant to section 0.457 and 0.459 of the Commission's rules.

The redacted version of this Form 481 submission will be filed via the Commission's Electronic Comment Filing System (ECFS) in the above-captioned docket.

If you have any questions about this filing, please contact the undersigned.

Edward L'. Cushing

Sincerely

Ketchikan Public Utilities - Telecommunications Division Manager

Marlene H. Dortch Federal Communications Commission June 30, 2014 Page 3

Attachment

cc: Charles Tyler

Telecommunications Access Policy Division

Wireline Competition Bureau

Federal Communications Commission 445 12th Street, S.W., Room 5-A452

Washington, DC 20554

FCC Foi	REDACTI rm 481 - Carrier Annual Reporting Data Collection Form	ED - FOR PU	BLIC INSPECTION FCC Form 481 OMB Control No July 2013	. 3060-0986/OMB Control No. 3060-0819
<010>	Study Area Code	613013		
<015>	Study Area Name	KETCHIKAN PUBL	IC UT	
<020>	Program Year	2015		
<030>	Contact Name: Person USAC should contact with questions about this data	Wende DeBoer		
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9072285479 ext		
<039>	Contact Email Address: Email of the person identified in data line <030>	wended@city.ket	tchikan.ak.us	
ANNUA	AL REPORTING FOR ALL CARRIERS			54.313 54.422 Completion Completion Required Required (check box when complete)
222	Service Quality Improvement Reporting Outage Reporting (voice)	o outages to report	(complete attached worksheet) (complete attached worksheet)	teners but when completely
<300>	Unfulfilled Service Requests (voice) 0			
<310>	Detail on Attempts (voice)		(attach descri	otive document)
<320>	Unfulfilled Service Requests (broadband)			✓ ///////
<330>	Detail on Attempts (broadband)		(attach descr	iptive document)
<410> <420>	Number of Complaints per 1,000 customers (voice) Fixed Mobile Number of Complaints per 1,000 customers (broad) Fixed 0.0 0.	band)		✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓
<450> <500>	Mobile 0.0 Service Quality Standards & Consumer Protection R	ules Compliance	(check to indicate certification)	1
<510>	613013ak510.pdf		(attached descriptive document)	/ /
<600>	Functionality in Emergency Situations 613013ak610.pdf		(check to indicate certification)	/ /
<610>			(Statical description description)	
<700>	0 ()		(complete attached worksheet)	
	Company Price Offerings (broadband)		(complete attached worksheet)	
	Operating Companies and Affiliates Tribal Land Offerings (Y/N)? Voice Services Rate Comparability		(complete attached worksheet) (if yes, complete attached worksheet) (check to indicate certification)	
<1010>			(attach descriptive document)	
	Terrestrial Backhaul (Y/N)?		(if not, check to indicate certification)	→
<1110>			(complete attached worksheet)	
<1200>	Terms and Condition for Lifeline Customers Price Cap Carriers, Proceed to Price Cap Additional	Documentation M	(complete attached worksheet)	A RESIDENCE A

(check to indicate certification)

(complete attached worksheet)

 $Including \ Rate-of-Return \ Carriers \ affiliated \ with \ Price \ Cap \ Local \ Exchange \ Carriers$

<2000>

<2005>

<3000>

<3005>

 <010> Study Area CC <015> Study Area Nu <020> Program Year <030> Contact Nam <035> Contact Teleg <039> Contact Emai If your answer <110> Has your com If your answer <111> year plan" file if your answer <112> voice telepho <112> Attach Five-Ya your annual p CETC which on required to at 	e - Person USAC should contact regarding this data e - Person USAC should contact regarding this data bhone Number - Number of person identified in data line <030> I Address - Email Address of person identified in data line <030> pany received its ETC certification from the FCC? r to Line <110> is yes, do you have an existing \$54.202(a) "5 ed with the FCC? r to Line <111> is yes, then you are required to file a progress e <112> delineating the status of your company's existing \$ fear plan" on file with the FCC, as it relates to your provision of ny service. as Service Quality Improvement Plan or, in subsequent years,	KETCHIKAN PUBLIC UT 2015 Wende DeBoer 9072285479 ext. wended@city.ketchikan.ak.us (yes/no) (yes/no)	
	should contact regarding this data Number of person identified in data line <030> Address of person identified in data line <030> ETC certification from the FCC? yes, do you have an existing §54.202(a) "5 yes, then you are required to file a progress in the status of your company's existing §5 with the FCC, as it relates to your provision of your provision your provision your provision you provision your provision your provision you provision y	KETCHIKAN PUBLIC UT 2012 Wende DeBoer 9072285479 ext. Wended@city.ketchikan.ak.us (yes/no) (yes/no)	
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	yes, do you have an existing the status of your conwith the FCC, as it relate y Improvement Plan or, it	(ves/no)	
	answer to Line <111> is yes, then you are required to file a progress, on line <112> delineating the status of your company's existing § 2(a) "5 year plan" on file with the FCC, as it relates to your provision of telephony service. There-Year Service Quality Improvement Plan or, in subsequent years,		
	your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.	613013ak112.pd£ npany is a	
Please ch 112, con plan pur center le	Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.		Name of Attached Document
<113> Maps de <114> Report h <115> How (US <116> How (US <117> How (US <117> How (US <117> How (US <118> Provide: in the pr	Maps detailing progress towards meeting plan targets Report how much universal service (USF) support was received How (USF) was used to improve service quality How (USF) was used to improve service coverage How (USF) was used to improve service capacity Provide an explanation of network improvement targets not met in the prior calendar year.		

Page 3

FCC Form 481. OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013			50				\$\ \$\ \$\	Prev										
3060-0986/OMB							\B\ \	Servic										
FCC Form 481 OMB Control No. July 2013							\$	Affect Stuc (Ye										
							\ \ \	Service Outage Description (Check										
							Ð	911 Facilities Affected (Yes / No)										
		PUBLIC UT		er	ext.	wended@city.ketchikan.ak.us	<c2></c2>	Total										
	613013	KETCHIKAN PUBLIC UT	2015	Wende DeBoer	30> 9072285479 ext.		\$	Number of Customers Affected										
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Control No. 3060-0819									\Q	Total per line Rates and Fees		
FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013									<	Mandatory Extended Area Service Charge		
FCC OM July									<94>	State Universal Service Fee		
		PUBLIC UT			ext.	wended@city.ketchikan.ak,us			<93>	State Subscriber Line Charge	See attached worksheet	
	613013	KETCHIKAN PU	2015	Wende DeBoer	030> 9072285479 ext		1/1/2014		 	Residential Local Service Rate	See a a t	
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ata				contact regardin	er of person ident	ss of person iden	ctive Date	ervice Charge	<a3></a3>	SAC (CETC)		
(700) Price Offerings including Voice Rate Data Data Collection Form	de	ne		Contact Name - Person USAC should contact regarding this data	Contact Telephone Number - Number of person identified in data line <030>	Contact Email Address - Email Address of person identified in data line <030>	Residential Local Service Charge Effective Date	Single State-wide Residential Local Service Charge	<92>	Exchange (ILEC)		
(700) Price Offerings inc Data Collection Form	Study Area Code	Study Area Name	Program Year	Contact Name	Contact Teleph	Contact Email	Residential Loc	Single State-wi	<a1></a1>	State		
(700) Price Data Colle	<010>	<015>	<020>	<030>	<035>	<039>	<701>	<702>	<703>			

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<010>	Study Area Code			613013					
<015>	Study Area Name			KETCHIKAN PUBLIC	IC UT				
<020>	Program Year			2015					
<030>	Contact Name - Person US	Contact Name - Person USAC should contact regarding this data	this data	Wende DeBoer					
<032>	Contact Telephone Numbe	Contact Telephone Number - Number of person identified in data line <030>	ed in data line <030>	9072285479 ext					
<039>	Contact Email Address - Er	Contact Email Address - Email Address of person identified in data line <030>	ied in data line <030>	wended@city.ketchikan.ak.us	tchikan.ak.us				
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	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
				- See attached worksheet	рец				

collection Form collo> Study Area Code collo> Study Area Name collo> Study Area Name collo> Study Area Name collo> Study Area Name collo> Contact Name - Person USAC should contact regarding this data collo> Contact Telephone Number - Number of person identified in data line collo> 90722 collo> Contact Email Address - Email Address of person identified in data line collo> 90722 collo> Contact Email Address - Email Address of person identified in data line collo> 90722 collo> Contact Email Address - Email Address of person identified in data line collo> 90722 collo Contact Telephone Number - Number of person identified in data line collo> 90722 collo Contact Telephone Number - Number of person identified in data line collo> 90722 collo Contact Telephone Number of Derson identified in data line collo> 90722 collo Contact Telephone Number of Derson identified in data line collo> 90722 collo Contact Telephone Number of Derson identified in data line collo Supplied Number of Derson identified in data line collo Supplied Number of Supplied Number o	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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Contact Email Address - Email Address of person identified in data line <030> Reporting Carrier City of Ketchikan d/b/a Ketchikan Public Util Holding Company City of Ketchikan	
Reporting Carrier Holding Company Dperating Company	.030> wended@city.ketchikan.ak.us
Holding Company City of Ketchikan Operating Company City of Ketchikan <a>>a> Affiliates	ic Utilities
Operating Company City of Ketchikan <a>>Affiliates	
<a1>Affiliates</a1>	
	<a2></a2>
	See attached worksheet

(900) Tri	(900) Tribal Lands Reporting	FCC Form 481
Data Col	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	613013
<015>		KETCHIKAN PUBLIC UT
<020>		2015
<030>	Contact Name - Person USAC should contact regarding this data	Wende DeBoer
<032>	Contact Telephone Number - Number of person identified in data line <030>	30> 9072285479 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>)30> wended@city.ketchikan.ak.us
<910>	Tribal Land(s) on which ETC Serves	Ketchikan Native Community Organized Village of Saxman
	J	
<920>	Tribal Government Engagement Obligation	613013ak920.pdf
		Name of Attached Document
If your to conf demon § 54.31	If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:	Select (Yes,No, NA)
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	Yes
<925>		Yes
<923>	Marketing services in a culturally sensitive manner;	Yes
<924>		Yes
<926>	Compliance with Facilities Siting rules	Xes Xes
<927>		Yes
<928>	Compliance with Cultural Preservation review processes	Yes
<929>	Compliance with Tribal Business and Licensing requirements.	Yes

(1100) N	(1100) No Terrestrial Backhaul Reporting	FCC Form 481
Data Co	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	613013
<015>	Study Area Name	KETCHIKAN PUBLIC UT
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Wende DeBoer
<032>	Contact Telephone Number - Number of person identified in data line <030>	9072285479 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	wended@city.ketchikan.ak.us
<1120>	Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)	
<1130>	Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)	

(1200) To Lifeline Data Col	(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	613013
<015>	Study Area Name	KETCHIKAN PUBLIC UT
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Mende Desoer
<035>	Contact Telephone Number - Number of person identified in data line <030>	
<039>	Contact Email Address - Email Address of person identified in data line <030>	:<030> wended@ciry.ketchikan.ak.us
		613013ak1210.pdf
<1210>	<1210> Terms & Conditions of Voice Telephony Lifeline Plans	
		Name of Attached Document
<1220>	Link to Public Website	НТТР
"Please of or the we	"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must	ó de la companya de
annually report:	report:	
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	
<1222>	Details on the number of minutes provided as part of the plan,	
<1223>	Additional charges for toll calls, and rates for each such plan. $iggl[$	

preceding calcings year.		line 2021, contains the required information shall provide the number, names, and ng access to broadband service in the	Con	<2014><2015><2016><2017><2017><2018><2019><2019><2019><2019><2019><2019><2019><2019><2019><2019><2019><2019><2019><2011> 10
			Interim Progress Community Anchor Institutions	<2021>
			Interim Propress Community Anchor Institutions	<7021>
לי ככבעוון במוכיום אביו .		line 2021, contains the required information shall provide the number, names, and ng access to broadband service in the	Please check the box to confirm that the attached document(s), on pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support addresses of community anchor institutions to which began providi preceding calendar year.	<2020>
				<2018> <2019>
			Connect America Phase II Reporting {47 CFR § 54.313(e)}	
Con			Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)} Certification Support Used to Build Broadband	<2016>
Con			2015 Frozen Support Certification 2016 and future Frozen Support Certification	<2014>
Con				0.070.000.000.000.000
Prid Con			Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a)) 2013 Frozen Support Certification 2014 Frozen Support Certification	<2012>
Price			2nd Year Certification (47 CFR § 54.313(b)(1)) 3rd Year Certification (47 CFR § 54.313(b)(2)) Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a)) 2013 Frozen Support Certification 2014 Frozen Support Certification	<2010> <2011> <2012> <2013>
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Incre Price Con	ort to offset access charge reductions, and Connect America Phase II its attached below is accurate.	ica Phase I support, frozen High Cost support, High Cost support) the information reported on this form and in the documents		CHECK th
	ort to offset access charge reductions, and Connect America Phase II its attached below is accurate.	wended@city.ketchikan.ak.us ica Phase I support, frozen High Cost support, High Cost support i) the information reported on this form and in the documents		<039> CHECK tt CLECK tt <2010> <2011> <2012> <2013>
	ort to offset access charge reductions, and Connect America Phase II its attached below is accurate.	wended@city.ketchikan.ak.us wended@city.ketchikan.ak.us ica Phase I support, frozen High Cost support, High Cost suppo		<pre><035> <039> </pre> <pre><2010> <2011> <2012> <2012> <2013> </pre>
	ort to offset access charge reductions, and Connect America Phase II its attached below is accurate.	2015 Wende DeBoex Wendedeotty, ketchikan.ak.us wendedeotty, ketchikan.ak.us ta Phase I support, frozen High Cost support, High Cost suppo		<pre><dc030> <030> <030> <030> <020</dc030></pre> CHECK th <pre><2010> <2011> <2012> <2013> </pre>
	ort to offset access charge reductions, and Connect America Phase II its attached below is accurate.	KETCHIKAN PUBLIC UT 2015 Wende DeBoer 9072285479 ext. wended@city.ketchikan.ak.us wended@city.ketchikan.ak.us yended@city.ketchikan.ak.us hended@city.ketchikan.ak.us wended@city.ketchikan.ak.us		<015> <020> <030> <035> <035> <031> <0201> <2011> <2012> <2013>
	ort to offset access charge reductions, and Connect America Phase II its attached below is accurate.	KETCHIKAN PUBLIC UT 2015 Wende DeBoer 9072285479 ext. wended@city.ketchikan.ak.us tica Phase I support, frozen High Cost support, High Cost support) the information reported on this form and in the documents the information reported on this form and in the documents.		<pre><010> <015> <005> <005> <008> </pre> <030> <039> <039> <000> <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000 <000
Control Cont	July 2013 ort to offset access charge reductions, and Connect America Phase II its attached below is accurate.	E13013 KETCHIKAN PUBLIC UT 2015 Wende DeBoer 9072285479 ext. wended@city.ketchikan.ak.us ica Phase I support, frozen High Cost support) the information reported on this form and in the documents	Study Area Code Study Area Code Study Area Name Program Year Contact Name - Person USAC should contact regarding this data Contact Name - Person USAC should contact regarding this data Contact Email Address - Email Address of person identified in data line <030> Contact Email Address - Email Address of person identified in data line <030> Contact Email Address - Email Address of person identified in data line <030> Contact Email Address - Email Address of person identified in data line <030> Contact Email Address - Email Address of person identified in data line <030> Contact Email Address - Email Address of person identified in data line <030> Contact Email Address - Email Address of person identified in data line <030> Contact Email Address - Email Address of person identified in data line <030> Contact Email Address - Email Address of person identification (47 CFR § 54.313(b)(1)) 31d Year Certification (47 CFR § 54.313(b)(1)) Price Cap Carrier Receiving Frozen Support Certification 2013 Frozen Support Certification 2014 Frozen Support Certification	c010> c010> c010> c010> c020> c030> c030
	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 ort to offset access charge reductions, and Connect America Phase II its attached below is accurate.	E13013 KETCHIKAN PUBLIC UT 2015 Wende DeBoer 9072285479 ext. Wended@city.ketchikan.ak.us wended@city.ketchikan.ak.us tabhase I support, frozen High Cost support the information reported on this form and in the documents	urn Carriers affiliated with Price Cap Local Exchancode Code Name The - Person USAC should contact regarding this data are person USAC should contact regarding this data are person USAC should contact regarding this data are person identified in data all Address - Email Address of person identified in data all Address - Email Address of person identified in data all Address - Email Address of person identified in data all Address - Email Address of person identified in data all Address - Email Address of person identified in data are receiving Address of person identified in data arrier Receiving Frozen Support Certification 4 Frozen Support Certification 4 Frozen Support Certification	ncluding ncluding

	(cool) have of neumin carries are also provided in the cool	FCC Form 481
Data Col	Data Collection Form	OMB Control No. 3060-0386/OMB Control No. 3060-0319 July 2013
<010>	Study Area Code	613013
<015>	Study Area Name	KETCHIKAN PUBLIC UT
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this	Wende DeBoer
<039>	Contact Telephone Number - Number of person identified in data line <030> Contact Email Address - Email Address of person identified in data line <030>	9072285479 ext. Wendedonity ketchikan ak na
CHECK	the boxes below to note compliance on its five year service quality plan (pursua CFR § 54.313(f)(2). I further certify that t	CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54,202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54,313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.
(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(i))	
	č	Name of Attached Document Listing Required Information
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	1012 contains the required information pursuant to assess of community anchor institutions to which began
(3012)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) If Yes, does your company file the RUS annual report	Name of Attached Document Listing Required Information (Yes/No) (Yes/No) (Yes/No)
Dioneo	2000 and an interest and bedeet and took majores at according to the	Distriction that constrained information and the E4 949/10/10
(3015)	Curea, ureas baxes to committe that the attached documently), or mine son Electronic copy of the rannual RUS reports (Operating Report for Telecommunications Borrowers)	rease diech inse bodas in Committat une audeineuts), un ime 5017, contains the required information pursuant to § 54.3 15U(Xz) compilance requires. [3015] Efectomic topy their annual RVD reports (Operating Report for
(3016)	-	sh Flows
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	
		Name of Attached Document Listing Required Information
(3018)		(Yes/No)
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3028 pursuant to § 54.3.13(f)(2), contains to reconfirm your submission, on line 3028 pursuant to § 54.3.313(f)(2), contains to recomparable to RUS Operating Report for Telecommunications and extensions of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications.	ormat comparable to RUS Operating Report for Telecommunications
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	ash Flows
(3021)	Management letter issued by the independent certified public accountant. that performed the company's financial audit	performed the company's financial audit.
	If the response is no on line 3018, please theck the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:	
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications	
(3023)		
(3024)	public accountant Underlying information subjected to an officer certification. Documentis for Balance Sheet. Income Statement and Statement of Cash Flows	SH Flows
		613013ak3026.pdf
(3026)	Attach the worksheet listing required information	
	_	11

	tion - Reporting Carrier lection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	613013
<015>	Study Area Name	KETCHIKAN PUBLIC UT
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Wende DeBoer
<035>	Contact Telephone Number - Number of person identified in data line <030>	9072285479 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	wended@city.ketchikan.ak.us

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

I certify that I am an officer of the reporting carrier; my respo recipients; and, to the best of my knowledge, the information	sibilities include ensuring the accuracy of the annual reporting requirements for univers reported on this form and in any attachments is accurate.	al service support
Name of Reporting Carrier: KETCHIKAN PUBLIC UT		
Signature of Authorized Officer: CERTIFIED ONLINE	Date	06/29/2014
Printed name of Authorized Officer: Daniel Lindgren		
Title or position of Authorized Officer: Assistant KPU Tele	communications Division Manager	
Telephone number of Authorized Officer: 9072285439 ext.		
Study Area Code of Reporting Carrier: 613013	Filing Due Date for this form: 07/01/2014	

	ion - Agent / Carrier ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	613013
<015>	Study Area Name	KETCHIKAN PUBLIC UT
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Wende DeBoer
<035>	Contact Telephone Number - Number of person identified in data line <030>	9072285479 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	wended@city.ketchikan.ak.us

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

I certify that (Name of Agent)	is authorized to submit the information reported on behalf of the reporting carrier
also certify that I am an officer of the reporting carrier; agent; and, to the best of my knowledge, the reports an	consibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized provided to the authorized agent is accurate.
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent	Authorized to File Annual Reports for CAF or LI Re	cipients on Behalf of Reporting Carrier
[유] (2017) [구구의 [1] (2017) [1] (1) [1] [1] [1] [1] [1] [1] [1] [1] [1] [1]	horized to submit the annual reports for universal service sup reporting carrier; and, to the best of my knowledge, the info	oport recipients on behalf of the reporting carrier; I have provided rmation reported herein is accurate.
Name of Reporting Carrier:		
Name of Authorized Agent or Employee of Agent:		
Signature of Authorized Agent or Employee of Agent:		Date:
Printed name of Authorized Agent or Employee of Agent:		
Title or position of Authorized Agent or Employee of Agent	t	
Telephone number of Authorized Agent or Employee of Ag	gent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	

Attachments



KPU Telecommunications 2970 Tongass Avenue Ketchikan, AK 99901

Phone (907) 225-1000 Fax (907) 225-1788

The City of Ketchikan d/b/a Ketchikan Public Utilities (KPU), study area code 613013, files an annual ETC report in compliance with Alaska Administrative Code (AAC). KPU submitted our last compliance report to the Regulatory Commission of Alaska on March 27, 2014. Our company's adherence to regulations is required for certification and our compliance to State standards is presented in our annual ETC report.

Line (500) Service Quality Standards & Consumer Protection Rules Compliance

KPU certifies that it complies with the requirements set out in 3 AAC 53.450 (a) and (c) which states:

- (a) An eligible telecommunications carrier shall maintain at least one business office, with toll-free calling if necessary, staffed during commission business hours, to provide customers with access to personnel who can timely provide information on services and rates, accept and process service applications, explain and adjust bills, and generally represent the carrier
- (b) KPU respectfully requests a waiver of this subjection as it does not pertain to ILECs.
- (c) An eligible telecommunications carrier shall commit to maintaining, in an easily accessible location on the company website, consumer complaint procedures.



KPU Telecommunications 2970 Tongass Avenue Ketchikan, AK 99901

Phone (907) 225-1000 Fax (907) 225-1788

The City of Ketchikan d/b/a Ketchikan Public Utilities (KPU), study area code 613013, files an annual ETC report in compliance with Alaska Administrative Code (AAC). KPU submitted our last compliance report to the Regulatory Commission of Alaska on March 27, 2014. Our company's adherence to regulations is required for certification and our compliance to State standards is presented in our annual ETC report.

Line (600) Functionality in Emergency Situations

KPU certifies that it complies with the requirements set out in 3 AAC 53.410(a)(12) which states:

- (12) a certification that the common carrier has and will continue to take steps to remain functional in emergency situations by
- (A) maintaining at least eight hours of backup power to ensure functionality without local alternating current (AC) commercial power;
- (B) establishing to the extent feasible the ability to reroute traffic around damaged facilities and to manage traffic spikes resulting from emergency situations; and
- (C) establishing procedures for employees to follow in an emergency to prevent or minimize interruption or impairment of telecommunications services.

(700) Pri Data Coll	(700) Price Offerings Data Collection Form	(700) Price Offerings including Voice Rate Data Data Collection Form	ata				FC OI Ju	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	B Control No. 3060-0819
<010>	Study Area Code	Code			613013				
<015>	Study Area Name	Name			KETCHIKAN PUBLIC UT	PUBLIC UT			
<020>	Program Year	ar			2015				
<030>	Contact Nar	Contact Name - Person USAC should contact regarding this data	contact regard	ng this data	Wende DeBoer	re			
<035>		Contact Telephone Number - Number of person identified in data line <030>	er of person ide	ntified in data line	<030> 9072285479 ext	ext.			
<039>	1 1	Contact Email Address - Email Address of person identified in data line <030>	ss of person ide	ntified in data line		wended@city.ketchikan.ak.us			
<701>		Residential Local Service Charge Effective Date Single State-wide Residential Local Service Charge	ctive Date ervice Charge	1/1//	1/1/2014				
<703>									
	<a1>></a1>	<a2></a2>	<a3></a3>	 	 	 	 	<	0
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
	AK	Ketchikan Public UT		FR	9.4	4.75	1.32	0.01	15.48

<010> Study Aı	Study Area Code			613013				
<015> Study A	Study Area Name			KETCHIKAN PUBLIC UT	IC UT			
<020> Program Year	ı Year			2015				
<030> Contact	Contact Name - Person USAC should contact regarding this data	d contact regarding	this data	Wende DeBoer				
<035> Contact	Contact Telephone Number - Number of person identified in data line <030>	oer of person identi	fied in data line <030>	1				
<039> Contact	Contact Email Address - Email Address of person identified in data line <030>	ess of person ident	ified in data line <030:	wended@city.ketchikan.ak.us	cchikan.ak.us			
<711>	<a2>></a2>	<	 	<tp><d><d1></d1></d></tp>	<q2></q2>	<		<444>
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Broadband Service Download Speed - Upload Speed (Mbps) (GB)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
AK	Ketchikan Public UT	49,95	6.5	56.45	3.0	1.0	150.0	Other, 5.00 for each 1GB over max.
		59.95	6.5	66.45	5.0	1.0	200.0	Other, 5.00 for each 1GB over max.
		74.95	6.5	81.45	10.01	1.0	150.0	Other, 5.00 for each 1GB over max.
		74.95	6.5	81.45	10.0	3.0	150.0	Other, 5.00 for each IGB over max.
		36.95	6.5	106.45	15.0	3.0	250.0	Other, 5.00 for each 1GB over max.
		129.95	6.5	136.45	20.0	3.0	250.0	Other, 5.00 for each 1GB over max.
-		199.95	6.5	206.45	55.0	5.0	0.005	Other, 5.00 for each 1GB over max.

Apple Appl	 <010> Study <015> Study <020> Progra <030> Conta <035> Conta <036> Conta <037> Conta <038> Conta <039> Conta <030> Conta <030< C			July 2013
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Contact Enail Address - Enail Address of person identified in data line cQ3D> Contact Enail Address - Enail Address of person identified in data line cQ3D> Reporting Carier City of Ketchikan Reporting Carier City of Ketchikan Operating Company City of Ketchikan Affiliates City of Ketchikan		ict Name - Person USAC should contact regarding this data	Wende DeBoer	
Reporting Company City of Ketchikan Africas Africas Africas Africas Contact Email Address - Email Address - Email Address of person identified in data line 433b Acceptaban Operating Company City of Ketchikan Ci		ict Telephone Number - Number of person identified in data line <030>	9072285479 ext.	
Reporting Company City of Metchikan GPA Metchikan GPA Metchikan Operating Company City of Metchikan Operating Company City of Metchikan Affiliates City of Ketchikan City of Ketchikan City of Metchikan City of Metchikan Metchikan City of Metchikan City of Metchikan	Holdii Operi	ict Email Address - Email Address of person identified in data line <030>	wended@city.ketchikan.ak.us	
Holding Company City of Metchikan Calp	Opera		tilities	
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Affiliates SAC Doing Business As Comparing the Comparing t		<a1></a1>	<a2></a2>	<33>
613013 Ketchikan Public Utilities		Affiliates	SAC	Doing Business As Company or Brand Designation
		City of Ketchikan	613013	- 11



Telecommunications 2417 Tongass Ave Ketchikan, AK 99901

Phone (907) 228-5458 Fax (907) 247-1888 kimm@city.ketchikan.ak.us

December 2, 2013

TO: Rod Short

Director of IT

Ketchikan Indian Community

FROM: Kim Simpson

Division Manager, Sales, Marketing and Customer Service

KPU Telecommunications

RE: KPU Tribal Engagement Meeting

The FCC requires Telecommunication entities to communicate regularly with tribal organizations within their serving area. This began in 2012.

At our meeting last year, you had suggested that we list KIC in the blue government section of the directory to mirror the organized village of Saxman's listings. We are pleased to let you know that we did make the change in the 2013/14 directory. KPU would like to set up a meeting with you and other KIC representatives to ensure that we are continuing to meet the communication requirements of KIC and the native people of Ketchikan.

Some of the items we would cover are:

- 1. Services we provide to Native Alaskans and plans for future services
- 2. Specialized marketing materials
- 3. Information regarding right of ways, cultural and environmental preservation, land use permitting and business licensing requirements.

Although KPU and KIC currently enjoy a very positive working relationship, we would still like to meet to ensure that we are doing everything possible to provide for the needs of your members.

Ed Cushing, Division Head for KPU Telecommunications, Dan Lindgren, KPU Telecommunications Regulatory Manager and I would be the KPU representatives. Please give me a call or email me as to convenient times for your organization. I would also appreciate knowing in advance any other KIC representatives/employees that you feel should attend this meeting.

Thank You!

Wende Deboer - RE: Tribal Engagement

From: Rod Short <rshort@kictribe.org>

To: Kim Simpson <KIMM@city.ketchikan.ak.us>, Dan Lindgren <DANL@city.ketchik...

Date: 12/4/2013 11:19 AM **Subject:** RE: Tribal Engagement

CC: Heidi Ekstrand <heidie@city.ketchikan.ak.us>

Use the normal 2960 Tongass address, it will be routed to me internally.

Thanks,

-Rod

From: Kim Simpson [mailto:KIMM@city.ketchikan.ak.us]
Sent: Wednesday, December 04, 2013 11:11 AM

To: Dan Lindgren; Wende Deboer; Rod Short

Cc: Heidi Ekstrand

Subject: Tribal Engagement

Hi Rod

It is that time of year for us to engage the local tribal organizations.

I will be mailing you the attached letter but wanted to ensure that you received a copy since you are now at 429 Deermount.

Which mailing address should I use for you?

Thanks Kim

Kim Nicole Simpson
Division Head
Sales, Marketing & Customer Service
Phone, Internet, TV & Business Solutions
KPU Telecommunications
907.228.5458 Direct
503.730.0323 Cell (text & phone)
907.254.2543 Cell (text & phone)



KPU Telecommunications

2970 Tongass Avenue Ketchikan, AK 99901

Phone (907) 225-1000 Fax (907) 225-1788

Lifeline Terms and Conditions are published in the Municipal Code section on the City of Ketchikan website under Telecommunications Service and Rates.

http://www.city.ketchikan.ak.us/departments/clerk/title11.html

Chapter 11.12 Section 11.12.07

11.12.070 Telephone and internet services. Description of service.

(8) Lifeline Service: Lifeline services offered by the utility include Enhanced Lifeline features available to subscribers residing on tribal lands, which include all of the KPU serving area. Lifeline service reduces the local service charges paid by qualified residential subscribers as described in 8(c) below, by deductions for the following charges:

(A) Lifeline deductions: Lifeline deductions consist of the following: Federal Subscriber Line Charge deduction, Federal and State reductions to local residential line rate, an additional Federal reduction to the line rate (because of state participation), and an enhanced lifeline credit for tribal lands (effective October 1, 2000) which brings the adjusted cost of a Lifeline supported residential line to \$1.00. See Section 11.12.080(b) for Lifeline Service rate.

- (B) Lifeline service consists of the following services only: Single party, voice grade access to the public switched network; Access to emergency services (911); Access to operator services; Access to interexchange services, unless toll blocking is installed; Access to directory assistance. (Ord 1747 §1, 2014)
- (C) Qualifications for Lifeline service. Applicants must meet the following criteria in order to qualify for Lifeline service:
- (i) The applicant must participate and maintain participation in one of the following programs: Medicaid; Supplemental Nutrition Assistance Program (SNAP); Food Stamps; Supplemental Security Income (SSI); Federal Public Housing Assistance; Low Income Home Energy Assistance Program (LIHEAP); Bureau of Indian Affairs General Assistance; Tribally Administered Temporary Assistance for Needy Families (TANF); Head Start Programs (only those meeting income qualifying standards); and National School Lunch Program (free meals program only), Alaska Temporary Assistance Program, Adult Public Assistance Program, VA Disability Pension, Child Care Assistance Program, Women, Infants and Children Program (WIC), Alaska State Housing Corporation Programs, Interest Rate Reduction for Low Income Borrowers,

Home Investment Partnership Program, Low Income Housing Tax Credit Program, Senior Citizen Housing Development Fund, Pioneer Home Payment Assistance, Denali Kid Care, State of Alaska Heating Assistance Program, Senior Care or receives benefits from another social services assistance program that (a) uses an income-based means test to determine eligibility for benefits, or (b) is administered by the state or federal government. A customer is eligible to participate in the lifeline program if the customer lives in a household with income at or below one hundred thirty-five percent of the applicable federal poverty guidelines for the state, as established by the United States Department of Health and Human Services. For the purposes of this eligibility, family unit and household are given the same meaning. (Ord. 1699, §2, 2012: Ord. 1623, §1, 2009: Ord. 1514, §1, 2005)

- (ii) The premises for which residential service is requested must be the applicant's principal place of residence and must not already have Lifeline service.
 - (iii) Lifeline service will be available on the primary residential

line only.

- (iv) Applicant must sign under penalty of perjury, a Lifeline application form certifying that they are receiving benefits from one of the qualifying programs, name of the program listed in (1) above, and that he/she will notify the utility if he/she no longer participates in the program named above. Applicants must provide documentation of program-based eligibility or proof of income. Lifeline customers will be required to verify and re-certify their eligibility each year. (Ord. 1699, §2, 2012: Ord. 1514, §1, 2005)
- (D) Loss of Lifeline eligibility. Applicants will become ineligible for Lifeline service for the following reasons: the applicant no longer participates in one of the qualifying programs, the location of service is not the applicant's primary residence, the location already has Lifeline service, the applicant fails to respond to the annual re-certification, or when service is disconnected under other provisions of this chapter. (Ord. 1699, §2, 2012)
- (E) Lifeline service may not be disconnected nor may service be refused to be provided to an eligible customer for non-payment of services other than basic service. Toll blocking may be activated by the utility in response to non-payment of toll charges. Services other than basic phone service, such as custom calling features and internet service may be disconnected. (Ord. 1514, §1, 2005)
- (F) If the Lifeline applicant chooses toll blocking, the utility will not charge a security deposit. Without the provision of toll blocking, and as applicable to custom calling and other features, regular security deposits will be required as set forth in Section 11.04.040 "Deposits." (Ord. 1447, §3, 2001: Ord. 1439 §1, 2000)
- (G) If a lifeline customer makes a partial payment on a bill that includes both local service and non-local services, the eligible telecommunications carrier shall apply the partial payment to local service first, unless the customer directs otherwise. (Ord. 1514, §1, 2005)



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RE: FCC FORM 481 – Line 3021 Management letter by the independent certified public accountant that performed the company's financial audit.

Greetings,

Our independent certified public accountant that is performing our audit has not completed the report at this time. The audit is expected to be complete by July 10, 2014 and we will resubmit the final comprehensive annual financial report (CAFR) with a management letter from the certified public accountant performing as soon as we receive the documents.

Please do not hesitate to call if you have any questions regarding this matter.

Sincerely,

Wende DeBoer Tariff Specialist (907) 228-5479